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COMMUNITY RELATIONS PLAN
SUMMIT NATIONAL SERVICES SITE,
DEERFIELD, OHIO

Revised September 1984

This community relations plan outlines the anticipated community relations program for the remedial investigation and feasibility study work at the Summit National Services site in Deerfield, Ohio. By agreement with the State of Ohio, the U.S. Environmental Protection Agency is responsible for planning and implementing community relations activities at the site. However, Ohio EPA has commented on the plan, and will assist in its implementation.

BACKGROUND AND HISTORY OF COMMUNITY INVOLVEMENT AT SITE

Site Background

The Summit National Services site (Summit) occupies 11.5 acres in the rural township of Deerfield, Ohio, located in Portage County. Summit operated as a liquid waste incineration facility from 1973 until June 1978. During this period, more than 60 generators disposed of onsite such wastes as resins, paint sludges, waste oils, flammable solvents, plating sludges, pesticide wastes, phenols, cyanides, acids, lab packs and various polymers. The wastes were disposed of in 55-gallon drums or by bulk discharge to onsite storage tanks. Some of the wastes were incinerated, while others were buried onsite or simply allowed to spill onto and/or leach into the site soils. The site was closed in mid-1978 with a remaining waste inventory of more than 15,000 drums of liquid and solid wastes, 50,000 gallons of bulk storage liquids and 250,000 gallons of open-stored liquids.

By October, 1981, site conditions presented serious hazards. The site created an air pollution threat for nearby residents. Heavy rainfall had caused the concrete block tank to overflow, contaminating one to two acres of soil, and a drainage ditch and tributary stream to the Berlin Reservoir, which is an auxilliary water supply for the city of Youngstown. The extent of surface and groundwater contamination of the tributary stream is not yet known. Anticipated use of the Berlin Reservoir the next two summers and the toxic nature of the wastes and the potential for migration were some of the reasons for immediate action.

Between February 1980 and 1981, the State of Ohio spent approximately [REDACTED] from an emergency appropriation to reduce the immediate hazards. The work included construction of a dike around the entire site, a drainage system to intercept shallow groundwater, and a security fence. Groundwater monitoring wells were installed. Bulk storage tanks and 2,000 drums were sampled, analyzed and segregated according to type. Some PCB-contaminated soil was containerized. Contaminated surface water was treated and a security guard was hired. In October and November 1980, EPA contributed [REDACTED] of CWA Section [REDACTED] funds to remove approximately 2,200 gallons of C-56 (an extremely toxic chemical) and 220 cubic yards of C-56 contaminated soil.

Many of the generators of the wastes removed a significant volume of surface waste. Negotiations with 63 different generators produced 36 out-of-court settlements totalling more than [REDACTED]. The State of Ohio reached an agreement with eight major generators, who contributed [REDACTED] to a [REDACTED] responsible party cleanup performed by a contractor. Under the

terms of the settlements, generators who contributed a negotiated sum of money to the State of Ohio for its cleanup efforts are released from further liability under State law. Summit National Services, the site owner and the remaining generators remain to be prosecuted under the State's filed lawsuit. However, all the parties remain potentially liable under CERCLA enforcement and cost-recovery provisions, and have been so notified.

The surface cleanup began in October 1981 and was completed in June 1982. All drums, bulk storage tanks, and the open concrete tank were removed, along with some obviously contaminated soil.

Community Concern

Complaints about Summit date back to 1973, when local residents concerned about air pollution from the Summit incinerator contacted the local Ohio EPA office. Citizen complaints increased in 1977 and 1978. In December 1978, 100-150 people attended a public meeting held in Deerfield. Organized by Doris Carver, the meeting brought community concern to a head. Sixty-four separate donations were collected from families and organizations to hire an attorney to initiate legal actions against Summit National Services. Under the leadership of Mrs. Carver, Concerned Citizens of Deerfield (CCD) succeeded in bringing the site to the attention of local and regional media.

In 1978, the Mahoning Valley Sanitary District (MVSD) became involved when its chief engineer, John Tucker, became concerned about potential contamination of the Berlin Reservoir, which MVSD owns. Tucker engaged a number of state legislators to address the problem.

In August 1979, CCD, MVSD, Ohio EPA, Ohio Attorney General's office, and the area's state legislator, Dave Johnson, brought a large group of state legislators to the Summit site and to Berlin Reservoir. Shortly thereafter, the Ohio Legislature allocated emergency funds to stabilize Summit.

The Deerfield Township Trustees enacted zoning ordinances for Deerfield in an effort to avoid future land use problems such as the Summit operation.

Community concern has been substantially allayed since 1980 by the response actions occurring at the site. However, the community continues to be very interested in the long term effects of the site. Citizens and officials expect the site's subsurface to be cleaned up if necessary, and they expect to be kept closely informed of the progress of the RI/FS.

Key Issues

CCD has been relatively inactive since its efforts succeeded in shutting down the site and initiating cleanup activities. As chief representative of the concerns of local residents, CCD must be assured that the remedial action taken will provide a long-term solution to the potential health and welfare threats posed by the Summit site.

The MVSD has a major interest in an effective long-term remedy to the potential threat of contamination of the Berlin Reservoir. The MVSD should be consulted about the results of the field investigations, the objectives of remedial action and the alternatives considered in the feasibility study.

Ohio state legislators have shown concern about both the Summit site and hazardous waste problems in general. Although concern has been moderated by the surface cleanup activities, local legislators should be regularly apprised of the status of Summit activities.

The State of Ohio took the lead on much of the surface cleanup work, and will be involved with the RI/FS. Ohio EPA officials should be kept informed regularly.

Local and regional press coverage of the Summit site and its public health implications has been extensive. Regular reports to the media will provide the public with the details of remedial activities at the site.

OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

1. Assure the local and regional community that EPA response will be timely and effective.
2. Provide Deerfield citizens and officials, the MVSD, local legislators and local and regional media with information regarding the objectives, progress and findings of the RI/FS.
3. Provide Deerfield citizens and officials, the MVSD and local legislators with the opportunity to comment on remedial action alternatives identified.

TECHNIQUES AND OBJECTIVES

1. Mailing list - Included in the appendix is a list of parties interested in the Summit site. The mailing list will be updated throughout the RI/FS, especially to add persons who attend public meetings.

Objective: to ensure that persons and agencies interested in the site are informed of all meetings, and are notified of information as it becomes publicly available.

2. Central Information Contact - U.S. EPA will assign one person, the community relations coordinator, to be the main contact for citizens, agencies, local and state officials and the media. The contact person's name, address and phone number will be included in all press releases and fact sheets.

Objective: to ensure that the community has access to someone for information, and to ensure that the information is provided consistently.

3. Local Information Repository - A public information file will be established at the local post office. Copies of relevant laws and the technical reports, fact sheets, technical summaries, updates and other documents relevant to the site will be added as they become available throughout the RI/FS.

Objective: to ensure that the local community has convenient access to all information relevant to Summit's RI/FS, especially for documents

that are too bulky or technical to send to all persons on the mailing list.

4. Public Meetings - Four public meetings will be held in Deerfield during the RI/FS process. The RI/FS workplan calls for CH2M Hill to provide meeting materials (overheads, slides, charts, etc.) for the meetings, and to send technical staff to the meetings. U.S. EPA's community relations coordinator (CRC) and on-scene coordinator (OSC) should conduct all meetings. They should include Ohio EPA staff in the planning of the meetings.

- A. Pre-RI/FS kick off meeting: Before activity begins on the site, EPA will conduct a meeting to describe the Superfund program, to introduce the OSC and CRC (Jay Plucinski and Margaret McCue), to explain the timeline and scope of work for the RI/FS, to describe the community relations plans, to describe the role of the state and federal government, and to answer questions about the site and the RI/FS.

Objective: to ensure that local citizens and officials know what to expect during the RI/FS.

- B. RI summary meeting: When the RI report is completed, EPA will conduct a public meeting to discuss the investigation's findings. The agency will also describe the alternatives being considered in the FS. If the RI shows a threat to the Berlin Reservoir, the agency should consider holding an additional meeting in the Youngstown area.

Objective: to ensure that the community knows what was found at the site, and understands the implications of the findings. The meeting will also provide an opportunity for citizens and officials to ask questions and

express their concerns about the findings.

- C. FS summary meeting: (See task 8) When the FS report is released, the agency will conduct a meeting to discuss all the potential remedial alternatives, especially the recommended alternative. The meeting will also serve as a public hearing to accept oral and written comment on the alternatives. If the RI shows a threat to the Berlin Reservoir, the agency should consider holding an additional FS meeting in the Youngstown area.

Objective: to ensure that the community knows about the alternatives considered for the site, and to ensure that interested parties have the opportunity to deliver their comments formally to the agency.

- D. Conceptual design meeting: If a remedial alternative is chosen for the site and if there appears to be sufficient public interest, the agency will hold meeting to describe the design for the alternative. The agency will also discuss the next steps for the site.

Objective: to ensure that the community knows what will happen to the site, and what to expect in the future.

5. News Releases - News releases will be issued to local and regional media to provide information about the RI/FS. They will include announcements of meeting report availability, and results of the RI/FS. In addition to those specified, releases will be issued as necessary throughout the RI/FS.

Objective: to ensure that the media is kept informed of significant milestones during the RI/FS, thus keeping the community informed.

- A. Announce the pre-RI/FS kickoff meeting, and briefly explain the purpose of the RI/FS.
- B. Announce the RI summary meeting, announce the availability of the RI report and technical summary, and briefly describe the RI findings.
- C. Announce the FS summary meeting/hearing, announce the availability of the FS report and technical summary, and briefly describe the FS findings. This release should also explain the public comment period.
- D. Announce the record of decision and outline the remedial action schedule, if appropriate. This release will also announce the conceptual design meeting, if one is held.

6. Fact Sheets/Updates - During the RI/FS, at least four fact sheets will be distributed to bring the community up to date on the project. They will be distributed to all persons on the mailing list, including the media. Handout copies will be made available at the post office.

- A. Project start up: As activity begins on the site, a fact sheet will be issued to describe the RI/FS activities and the overall project schedule, and to name the information contact and the repository location.

Objective: to ensure the community knows that work is beginning, and to reinforce the time schedule, information contact and repository.

- B. Mid-point of RI: Halfway through the investigation, a fact sheet will be issued to describe the activities completed to date, to explain the findings (if appropriate) and to update the time schedule, if necessary.

Objective: to inform the community that the RI is progressing at the site. This is important at Summit National because of the long RI schedule, and because the community is very interested in the site.

- C. RI completion: Just prior to the RI summary meeting, a fact sheet will be distributed to briefly describe the actions and findings of the RI (including contaminants and health effects). The fact sheet will also summarize the alternatives being considered and announce the RI meeting.

Objective: to inform the community that the RI is completed, and to ensure that the community knows about the findings and their implications.

- D. FS conclusion: Just prior to the FS meeting/hearing, a fact sheet will be distributed to briefly describe the alternatives that were evaluated, and to explain the recommended alternative. The update will include information on the public comment period and the process by which a final decision for remedial action is made.

Objective: to ensure community understanding of the FS process and the public role in the comment period.

7. Technical Summaries - In conjunction with the RI summary and FS summary meetings, technical summaries of the reports will be developed. The technical summaries will provide clear, accurate descriptions of the study results, in more detail than that provided in the fact sheets. They will be distributed to the mailing list, with copies available at the post office.

Objective: to ensure that the community has access to an understandable interpretation of the RI and FS findings. The FS summary should provide interested persons with enough information for them to make comments.

8. Public Comment Period - A three week public comment period will be provided after release of the FS. If possible, notice of the comment period and of the availability of the report and technical summary, will be provided two weeks before the start of the comment period. The public meeting (see item 4C) should occur toward the beginning of the comment period, to allow people attending the meeting time to submit written comments. Both oral and written comments will be accepted during this period.

Objective: See task 4C. Also, the comment period will ensure that the agency considers public comments when choosing a final remedial action.

9. Responsiveness Summary - A responsiveness summary will be prepared after the public comment period to summarize the comments received throughout the RI/FS, and to present the agency's response to them. The RS will be distributed to the mailing list, with a copy placed in the repository.

Objective: to show that public comments were considered during the development of a final remedial action decision. The summary will also show the public how the agency intends to address community concerns.

10. Informal Briefings - Throughout the RI/FS, the CRC or OSC may call local officials and citizen representatives to update them on the study. This will be important if the RI shows a threat to drinking water. The OSC or CRC

will also provide such updates by phone or in person if requested by local officials or citizens.

Objective: to provide immediate information on the status of the RI/FS, if needed, and to provide an additional communications channel with interested persons in Deerfield.

APPENDIX
SUMMIT NATIONAL SERVICES, INC., DEERFIELD, OH
INTERESTED LOCAL GROUPS AND INDIVIDUALS
(Revised 8/84)

Local Government

Deerfield Township Board of Trustees

William Earnest

Miles Felmly

Herman Prevot, Jr.

Betty Jones - Clerk Box 121, Deerfield (

Fire Departments

Deerfield Fire Chief:

Atwater Fire Chief,

Alliance Fire Chief, 63 E. Broadway, Alliance, OH 44601

Portage County Government

Portage Co. Sheriff's Office, 203 W. Main St., Ravenna, OH 44201

Dolores Reed, County Clerk, 449 S. Meridian, Ravenna, OH 44266

Mahoning Valley Sanitary District

John Tucker, P.O. Box 4149, Youngstown, OH 44515 (

State Government

Ohio EPA, Division of Hazardous Materials Management

Roger Hannahs, Mgr., Unregulated Site/Superfund Mgmt. Program

Section, P.O. Box 1049, Columbus, OH 43216 (

Ohio EPA, Northeast District Office

Gary Gifford, Project Coordinator

2110 E. Aurora Rd., Twinsburg, OH 44087 (

Ohio EPA, Public Interest Center

Allan Franks, Chief

Patricia Madigan, Asst. Cf., P.O. Box 1049, Columbus, OH 43216

State Attorney General's Office

Joel Taylor, P.O. Box 1049, Columbus, OH 43216

Martha Horvitz

Terrence Fay

Ohio EPA, Division of Public Water Supply

Tom Bachlawski, P.O. Box 1049, Columbus, OH 43216

Federal Government

EPA Region V, Chicago

Jay Plucinski, OSC

Margaret McCue

Jon McPhee, Enforcement Staff

Mike Elam, Enforcement Staff

Congressional Delegation
U.S. Representative Dennis Eckart

Senator John Glenn
200 W. High St., Suite 600
Columbus, OH 43215

Senator Howard Metzenbaum
121 E. State St., Rm. 442
Columbus, OH 43215

OH Representative Paul Jones
110 E. Main St.
Ravenna, OH 44266

OH Senator Marcus A. Roberto

Local Groups and Individuals
Concerned Citizens of Deerfield
Doris Carver, President, 8465 SR 224, Deerfield, OH 44411
Helen Huchok, Vice-President
Betty Jones, Treasurer
Joan Wallbrown, Secretary

Site Neighbor

No telephone

Media
Cleveland
Roger Wolf, Television Channel 3
Television Channel 5
Television Channel 8
Jim Lawless, Cleveland Plain Dealer

Akron
Bob Jeffries, WAKR
Barb Adams, WSLR
Vicki Locke, WHLO
Jim Carney, Akron Beacon Journal

Youngstown
Denny Brand, WYTV
Youngstown Vindicator
WKBN - Joe Gillis

Alliance
George Salisbury, Alliance Review

Ravenna - (County Seat)
Linda Joseph, Record Courier News

Warren
Warren Tribune